

Letter For Electronic Distribution

Original signed letter on file at the following address:

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April 5, 2000

Mr. John Dirickson, P.E.
Environmental Engineer
Naval Air Station, Fallon
Public Works Department
Environmental Division-Code 187JD
4755 Pasture Rd.
Fallon, NV 89496

RE: NDEP Response to Site 12, Pest Control Shop
Draft Final Decision Document, August 27, 1999, Sites 4, 7, 9, 10, 11, 12, 17, 18, 19, 23, and 24
Remedial Investigation/Feasibility Study
Naval Air Station Fallon

Dear Mr. Dirickson:

Nevada Division of Environmental Protection (NDEP) staff has reviewed NAS Fallon's Report entitled *Decision Document, Sites 4, 7, 9, 10, 11, 12, 17, 18, 19, 23, and 24, Draft Final*, dated August 27, 1999. This report was prepared in response to a series of NDEP letters which commented on NAS Fallon's report entitled *Record of Decision, Sites 4, 5, 7, 8, 9, 10, 11, 15, 17, 18, 19, 23, 24, 25, 26, 27 Naval Air Station Fallon* (ROD), dated June 5, 1998. Due to significant changes between the Draft Final Decision Document and the Record of Decision, the referenced Draft Final Decision Document was reviewed as a draft document instead of a draft final. NDEP's comments on Site 12, Pest Control Shop, are addressed in this letter.

The level of detail and explanation presented in the Draft Final Decision Document does not appear to adequately explain the nature and extent of soil and groundwater contamination associated with Site 12. Based on interpretations presented by NAS Fallon after the Remedial Investigation (RI) Report was completed in September 1994, and on NDEP's review of site conditions and supporting documentation to verify information provided in the Draft Final Decision Document, the NDEP remains concerned that significant data gaps remain. In particular, it appears that Site 12 may be the source of carbon tetrachloride, methylene chloride, and total petroleum hydrocarbon (TPH) contamination in groundwater. Also, it appears that the extent of pesticide contamination has not been adequately investigated. Issues regarding the analytical procedures used to analyze pesticides at Site 12 need to be addressed. It appears that only one boring log for Site 12 exists in the Administration Record and data on this boring log (e.g. thick sands and strong pesticide odors in MW22) suggest contaminants may be migrating from the site. Additionally, soil samples collected from the borings at Site 12 were not analyzed for TPH, semivolatile organic compounds, (SVOC) or volatile organic compounds

(VOCs) to evaluate potential sources for the groundwater plumes. NAS Fallon asserts that contamination at Site 12 is related to the dissolved contaminant plume originating from Site 14. However, contaminants associated with Site 14 do not include contaminants which were identified at Site 12. The nature and extent of contamination at Site 12, and the potential for the contaminants to migrate, does not appear to have been fully evaluated.

This document needs to be available to the public for review, as appropriate, and an accurate record in the Decision Document is required so that an informed decision can be made. Significant amounts of data pertinent to evaluating the source and extent of contamination associated with Site 12 appear to have been omitted from the Draft Final Decision Document. The Decision Document needs to include the revised interpretations of the groundwater plumes at Site 12 which were presented in the draft Comparison of Groundwater Alternatives (CGA) Report dated December 1997. Also, the limited nature of the investigation needs to be addressed (e.g. no groundwater investigation in the northern leachfield, limited analyses for soil samples, etc.). Site conditions cannot be adequately interpreted by the reader if these issues are not addressed and if updated drawings are not presented. These deficiencies, which are detailed in the comments attached to this letter, need to be addressed in a revised Decision Document.

Formal approval of a “No Further Action” Decision Document is based on the extent of the investigation and remediation, an understanding of the nature and extent of contamination, documentation in the administrative record, and post closure care which includes institutional controls, land use restrictions, and/or post-closure monitoring. Based on a review of data collected from Site 12 and new interpretations of site conditions presented by NAS Fallon, the NDEP remains concerned that contamination associated with Site 12 could be more extensive than presented in the Draft Final Decision Document. Of considerable concern to the NDEP is that documentation to support the “No Further Action” recommendation in the Draft Final Decision Document does not appear to be included in the Administrative Record. In a letter dated January 22, 1999, the NDEP requested that supporting documentation (including borings logs with field screening results, laboratory analytical reports and the RI/FS Sampling and Analysis Plan) be provided to the NDEP. These documents have not yet been provided. In consideration of these factors, NDEP’s previous concurrence with a “No Further Action” determination is no longer valid.

NAS Fallon needs to re-evaluate Site 12. A proposed plan of action which addresses NAS Fallon’s plans for re-evaluating contamination that appears to originate from Site 12 needs to be submitted to the NDEP for review. The plan of action also needs to address NDEP’s comments on the Draft Final Decision Document for Site 12 which are attached to this letter. NAS Fallon has not responded to many of NDEP’s comments presented in the letter dated January 22, 1999. Comments in that letter which were not addressed in the Draft Final Decision Document are reiterated in the comments attached to this letter.

Since many of the issues regarding Site 12 have been on-going and unresolved for an extended period of time, please provide a time frame for addressing the comments in this letter within 30 days. If we as project managers cannot agree on a process to resolve these issues, the NDEP will need to initiate the dispute resolution process. If you have any questions, or need further clarification, please do not hesitate to contact me at (775) 687-4670, extension 3053.

Sincerely,

Jeffrey J. Johnson, P.E.
Geological Engineer

JJJ/js
cc:

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**COMMENTS ON THE DRAFT FINAL DECISION DOCUMENT
SITE 12, PEST CONTROL SHOP**

1. Page 1, third paragraph: The Draft Final Decision Document states: “*The decision not to undertake a remedial action for this site is consistent with the factors set forth in the National Contingency Plan (NCP) 40 CFR part 300, and Nevada Administrative Code (NAC) Sections 445A.226 through 445A.22755. This decision was based on one or more of the following*” (three bulleted reasons follow).

The NDEP cannot concur with the above statement for the following reasons:

- C Exposure to contractors during excavation activities and trespassers is possible (See page A-111 of the Baseline Risk Assessment). Therefore, the statement after the first bullet does not appear to be accurate.
 - C Soil and groundwater contamination were identified at Site 12, and the extent of contamination does not appear to have been completely evaluated. NAS Fallon has not demonstrated that this site is not the source of groundwater contamination. Therefore, the statement after the second bullet does not appear to be accurate. See comments **3, 7, 8A, and 10**.
 - C Supporting documentation appears to be missing from the administrative record. See comments **4, 7, 8A, and 14**. Therefore, NAS Fallon does not appear to be in full compliance with 40 CFR Part 300, Subpart I: Administrative Record for Selection of Response Action.
 - C The decision not to take remedial action at Site 12 is not consistent with 445A.226 through 445A.22755 because federal Maximum Contaminant Limits (MCLs) have been exceeded and the site is not currently being remediated.
2. Page 1, last paragraph in Section I: The Draft Final Decision Document states: “*The Nevada Division of Environmental Protection (NDEP) has reviewed this document and concurred with this decision. There are not any nationally significant or precedent setting issues for this site.*”

The NDEP concurrence with “No Further Action” for this site in the letter dated May 17, 1994, was based on the assumption that reasonably supporting documentation would be formally presented in the Decision Document. However, numerous issues which are detailed in the comments in this letter have not been acceptably supported by documentation. Concurrence with No Further Action was also provided before proposed, revised interpretations of the groundwater plumes were provided in the draft CGA Report dated December 1997. Due to these factors, the NDEP’s previous concurrence with a “No Further Action” determination is no longer valid. See comment **11**.

3. Page 2, Section A, last paragraph: “*The RI Report recommended 14 of the remaining 21 IR Program sites, including Site 12, the Pest Control Shop for “no further action”. ... No contamination was found in relation to the activities at Site 12 and the source of the groundwater contamination below the site is from the dissolved plume from the up gradient Site 14, Old Maintenance Shop . The groundwater remediation will be accomplished as part of the Site 14 remedial action.*”

This statement appears to be inconsistent with data collected during the Remedial Investigation/Feasibility Study (RI/FS) and with more recent interpretations provided in the draft CGA

Report dated December 1997. Contamination detected at Site 12 appears to be associated with Site 12 activities. See comments **8A** and **10**. Also, based on the draft CGA Report dated December 1997, Site 12 was identified as the source for carbon tetrachloride and methylene chloride (see figures 2-31 and 2-32 on pages 2-105 and 2-106). Concentrations of these contaminants have exceeded the federal MCLs. These contaminants have also been identified as Contaminants of Concern (COC) in the draft CGA Report. Data and conclusions that were presented after the RI Report was completed (September 1994) need to be considered in the decision process and included in the Decision Document.

4. Pages 2, Section 1.2 Geology: Site-specific geological conditions for Site 12 were not presented in the Draft Final Decision Document. Therefore, the NDEP reviewed various documents to evaluate if geological information is available for Site 12. The nearest monitoring well to Site 12 is MW22. The well was installed near the downgradient limit of the site. The well log for MW22 in Appendix F of the RI Report shows sand continuing from the surface to below the water table which ranges from 7.01 to 7.51 feet below ground surface (Appendix H). Pesticide odors were recorded on the log at the water table. A discussion regarding the presence of sand in MW22 and the pesticide odors need to be provided in the Decision Document. This information is critical to understanding contaminant transport. This information is also important when considering that some pesticides may not have been analyzed for. See comment **8A**.

Seven borings were drilled at Site 12. Lithologic descriptions from these borings were not provided in the RI Report or the Draft Final Decision Document. Due to a lack of data, geological conditions and contaminant transport mechanisms associated with Site 12 do not appear to be well understood. In a letter dated January 22, 1999, the NDEP stated that boring logs for Site 12 have not been provided. NDEP also stated that information or data used to support the "No Further Action" recommendation must be backed up with supporting documentation, and that the boring logs need to be present in NDEP's files. The NDEP has not yet received the Site 12 boring logs. The Site 12 boring logs need to be made available to the NDEP for review if data collected from the borings and presented on the logs are used to support the "No Further Action" decision. See comments **5** and **14**.

5. Pages 5 and 6, Section F, last paragraph: The Draft Final Decision Document states "*The Draft Decision Document dated November 1995 for 6 sites including Site 12 was published on 31 January 1996 in the Lahontan Valley News and the Fallon Eagle Standard. These community participation activities fulfill the requirements of the CERCLA: Section 113(k)(2)(B)(I-v) and 117(a)(2). The Administration Record is available for review at the Churchill County Library.*"

The draft Decision Document dated November 1995 (received by NDEP January 23, 1996) was never completed by NAS Fallon. The NDEP provided comments in a letter dated March 5, 1996. Due to the elapsed time since the original draft Decision Document was published, NAS Fallon's failure to respond to NDEP's comments and complete the document, and the fact that the current document will contain different information, community participation during review and approval of the revised Draft Final Decision Document may need to be addressed again.

Based on Appendix A in the Draft Final Decision Document (Administrative Record), the documents listed below were not included in the administrative record. These documents should be listed because they contain data, factual information, and analyses that form the basis for the selection of the response action.

- C Progress Reports that included data or interpretations for Site 12 and 14. This was previously requested in NDEP's letter dated March 5, 1996.

- C Logs for the seven borings, including field screening results for the soil samples.
- C Laboratory analytical reports.

6. Page 6, Section III. Investigation Summary: The Draft Final Decision Document states “*The Phase II RI for Group IV Sites consisted of conducting 2 geophysical surveys, 29 soil borings, 202 groundwater test borings, 25 monitoring wells, and 9 piezometers. Most of these investigations were conducted to evaluate the dissolved and free product plumes on site 14 and Site 16.*”

Most of these activities cannot be used to evaluate the nature and extent of contamination at Site 12. Those activities pertinent to Site 12 should be presented in this section. Site 12 was evaluated with one groundwater monitoring well (MW22) and seven borings. The Decision Document needs to include this information. If off-site wells are discussed, then their distances and directions from Site 12 need to be provided.

7. Page 6, Section A. Vadose Zone and Soil: The Draft Final Decision Document states: “*Boring hole (BH07) was drilled and sampled within 4 ft of former BH02. A soil sample from the 5 to 7 ft below ground level was submitted for laboratory analysis. The results show no contamination by DDT or its derivatives, indicating that the previously detected contamination is not continuous in the area. The level of soil contamination of DDT, DDD and DDE are below the State action levels*”

The NDEP does not concur with the conclusion in the above statement. NDEP previously commented on this issue in the letter dated January 22, 1999 (first paragraph on page 6). The sample from BH07 was subjected to the Toxicity Characteristic Leaching Procedure (TCLP) to determine leachable quantities of pesticides. Soil samples collected from the other boreholes were analyzed for pesticides using EPA Method 3550/8080. Analytical results using the TCLP cannot be compared to analytical results using EPA method 3550/8080 to determine that previously detected contamination was not continuous at the site. Furthermore, maximum concentrations for DDT, DDD, and DDE using the TCLP have not been established. DDT, DDD, and DDE concentrations need to be compared to the PRGs to evaluate acceptable levels. Also, the last sentence in the above quote which states “*The level of soil contamination of DDT, DDD and DDE are below the State action levels*” needs to be explained in the Decision Document. Based on data presented in the Draft Final Decision Document, the extent of soil contamination does not appear to have been fully evaluated. These issues need to be clarified in the Decision Document.

NDEP also expressed concern in the January 22, 1999 letter that some soil samples may not have been analyzed within established holding times. NDEP requested that analytical reports be submitted to verify holding times. These reports have not yet been submitted. Analytical reports which are used to justify the “No Further Action” recommendation need to be made available to the NDEP for review. See Comments 5 and 14.

- 8A. Pages 6 and 7, Section B. Groundwater, first paragraph in section: The Draft Final Decision Document states “*Results of the screening of the groundwater test borings and the piezometer boring indicated a contaminant plume thought to be emanating from Site 12 and 13. Further investigation showed that the dissolved phase plume from Site 14, the Old Vehicle Maintenance shop, extends beneath the two sites*”

This statement was taken from the RI Report, but is not totally consistent with the January 1992 Preliminary Site Characterization (PSC) Summary. The PSC Summary indicates that Site 12 may be a source of contamination and states “*Investigation activities confirmed floating hydrocarbon product*

at Site 14 which creates a plume that appears to merge with **possible pesticide contamination** coming from site 12 and fuel oil contamination associated with site 13” (page 168). The Draft Final Decision Document does not mention the possible presence of pesticides in groundwater. The only source for pesticides in this area is Site 12. No groundwater samples were collected under the north leachfield where significant concentrations of DDT were identified in soil, and it is possible that groundwater underlying the north leach field could be contaminated with pesticides. Also, pesticide odors were recorded on the log for MW22 (see comment 4) at the downgradient end of Site 12, and the analysis of pesticides in groundwater samples collected from this well appears to be incomplete (see the next paragraph). These issues need to be clarified in the Decision Document. Due to the unknown nature and extent of contamination underlying Site 12 and the uncertainty regarding geologic conditions, the potential for contaminants to migrate from Site 12 is unclear.

The January 1992 PSC Summary states:

“... currently used pesticides such as malathion, parathion, pyrethrin, and diazinon, which are not detected with the same analytical method as that used for the EPA-listed pesticides, were not tested for. Therefore, a different analytical method was requested for pesticides on the second round of water samples taken in August 1991. These results will be included in the next report” (page 146).

A similar statement was provided on page 10-47 of the RI Report. Based on Table 2 in the Draft Final Decision Document, the same analytical method was used to analyze pesticides during the April 1991 and August 1991 sampling events. It appears that a different analytical method was not used during the second sampling event and that pesticides such as malathion, parathion, pyrethrin, and diazinon were not analyzed for. This issue needs to be clarified in the Decision Document. Also, analytical reports which provide supporting documentation for the analysis of pesticides, and which are being used to justify the “No Further Action” recommendation for Site 12, need to be made available to the NDEP for review. See Comments 5 and 14.

Analytical data collected from monitoring well MW22 show that Site 12 may be a source for several contaminants in groundwater. Concentrations for some of the contaminants detected in MW22 exceeded the federal MCLs. These contaminants include carbon tetrachloride (MCL= 5 ug/L), benzene (MCL = 5ug/L), and methylene chloride (MCL = 5 ug/L). These contaminants were identified as COCs for Site 12 in the draft CGA Report dated December 1997. Carbon tetrachloride and methylene chloride were not detected at Site 14, which indicates that Site 12 may be the source for these contaminants. Site 12 may also be a source of TPH contamination as the diesel concentration in MW 22 (5000 ug/L) is higher than the diesel concentration in MW20 (60 ug/L). MW20 is located between Sites 12 and 14. These issues need to be addressed in the Decision Document.

NDEP’s letter dated January 22, 1999 requested that drawings be provided which present contaminant concentration contours and illustrate the potential source areas. The drawing in the Draft Final Decision Document for Site 12 which shows contaminant concentrations is a copy of Figure 10.9 from page 10-31 of the RI Report. The drawing shows contaminant concentration contours, but does not specify what contaminants were contoured or identify potential source areas for specific contaminants. Although the drawing indicates that Site 12 may be a source of groundwater contamination, it is difficult to interpret because all contaminants are lumped together into one set of concentration numbers. The draft CGA Report, dated December 1997, does a better job to illustrate contaminant sources. The draft CGA Report shows that Site 12 may be the source for carbon tetrachloride and methylene chloride plumes (pages 2-105 and 2-106). See comment 3. Drawings which show the source of contaminants associated

with Site 12 need to be included in the Decision Document.

If groundwater contamination at Site 12 is to be addressed with groundwater contamination at Site 14, justification needs to be provided in the Decision Document. The ongoing intrinsic remediation study for Site 14 is focusing on contaminants associated with petroleum fuels, but does not address pesticides or carbon tetrachloride. Justification for combining groundwater remediation at Site 12 with Site 14 needs to include a description of contaminant source areas, a comparison of COCs, and a discussion on how intrinsic bioremediation (which may be selected as the remedial alternative for Site 14) will address the COCs associated with Site 12.

The current status of runoff control over the leachfields needs to be addressed in the Decision Document. This issue was previously discussed in NDEP's letter dated January 22, 1999. The January 1992 PSC Summary states on page 131 "*At this time neither leach field appears to be operational; however, wastewater has been observed running off to the leach field areas and infiltrating the soil.*" The PSC Summary also states on page 171 that Site 12 does afford a substantial transport mechanism for downward transport of near surface contaminants, and that wash water which is allowed to run off to the leachfield areas creates a downward flow gradient which may cause percolation of contaminants to the underlying aquifer. If best management practices (BMPs) have been implemented at Site 12 to control runoff, then the BMPs need to be discussed in the Decision Document.

- 8B. Page 7, Section B. Groundwater, second paragraph on page: The Draft Final Decision Document states that one additional well was proposed at the site. If this well was drilled, the well needs to be identified, and data collected from the well need to be provided.
- 8C. Page 7, Section B. Groundwater, third, fourth and fifth paragraphs on page: The Draft Final Decision Document discusses analytical results from MW55 in detail. MW55 is located approximately 350 feet southeast of Site 12. Monitoring wells MW23 and MW24 were drilled significantly closer to Site 12, yet a description of analytical results collected from these wells is not provided. Data collected from these wells need to be presented in the Decision Document.
- 8D. Page 7, Section B. Groundwater, last paragraph on page: The Draft Final Decision Document states "*Bail tests from monitoring wells MW20, MW22, and MW24 resulted in hydraulic conductivity ranging from 0.9 to 2.3 ft day. Combining the groundwater gradient of 0.0005 ft across Site 12 and assuming an effective porosity of 33% results in calculated groundwater velocities of 0.5 and 1.7 ft/day respectively.*"

This paragraph was copied directly from the draft Decision Document dated November 1995. NDEP provided comments on this paragraph in the letter dated March 5, 1996, but NAS Fallon did not respond to the comments. NAS Fallon needs to review the March 5, 1996 letter.

Bail tests provide qualitative hydraulic conductivity data and are less reliable than pumping tests for providing representative hydraulic conductivities. At NAS Fallon, bail tests have generally underestimated hydraulic conductivities. The RI report states on page E-16 "*The results of the pumping tests indicate K values 5 to 125 times higher than the bail-test values. The bail-test data are considered strictly qualitative and yield a relative number for each location*". As stated on page 8 of the Draft Final Decision Document for Site 4, bail tests can yield hydraulic conductivities lower than actual aquifer hydraulic conductivities due to the "skin effect" and may be more characteristic of the sand pack placed in the well instead of the aquifer. The soils at Site 12 appear to consist mostly of sands (see comment 4). Based on the soil type, bail test data, and the relationship between bail test data and

pumping test data, the hydraulic conductivity at Site 12 could be significantly higher than 2.3 feet/day. This indicates that the estimated groundwater velocity of 1.7 feet/day for Site 12 could be underestimated. This is important information for evaluating contaminant transport and needs to be addressed in the Decision Document.

9. Page 8, Section C. Risk Assessment Summary: The risk assessment summary does not summarize results for risks associated with groundwater. The risk assessment for groundwater at Site 12 was included with the Group IV Sites. The maximum concentration of each contaminant identified from any of the Group IV sites was used in the risk assessment. Six contaminants detected in monitoring well MW22 at Site 12 were selected for the risk assessment analysis. These contaminants include 1,1-Dichloroethane; 1,1,1-Trichloroethane; 1,2-Dichlorobenzene; 2-4 Dichlorophenol; alpha -BHC and gamma- BHC (lindane). The risk assessment for the Group IV sites indicated a high human health risk associated with off base, residential uses and a great potential for phytotoxicity (see pages A-102 through A-105 in the Baseline Risk Assessment). A discussion regarding the risks associated with Site 12 contaminants needs to be summarized in the Decision Document.
10. Page 8, Section D. Conclusion: The Draft Final Decision Document states “ *Contaminant concentration in the soil are below the State action level. Ground-water contamination below the site is related with the dissolved contaminant plume originating from Site 14, the Old Vehicle Maintenance Shop. Plume remediation will be accomplished as part of the Site 14 action.*”

The NDEP does not concur with the last two sentences in the above quote. See comments **3, 7 and 8A**). In regards to the first sentence, the Decision Document needs to specify which contaminants are below the State action levels, and compare contaminant concentrations to the ARARs. It should also be noted that TPH was not analyzed in soil samples collected from Site 12. TPH contamination exists in groundwater at Site 12 and could have originated from the leachfields where the run-on of wastewater was observed. Based on concentrations of some hydrocarbon constituents (e.g. benzene) being higher in MW22 than in MW20 to the west, it is possible that Site 12 may be a source for TPH. See comment **8A**. The Decision Document needs to address these issues.

11. Page 8, Section IV. Proposed Action: The Draft Final Decision Document states “ *The Phase II of the IR Program, soil testing results indicated that no DDT or its derivative contamination at Site 12, Pest Control Shop. Previously detected contamination was not continuous at the site....The ground water contamination below Site 12 is contiguous with the dissolved hydrocarbon plume originating from Site 14*”

The NDEP does not concur with this statement for the reasons stated throughout this letter. See comments **3, 7 and 8**.

The Draft Final Decision Document also states “ *NDEP letters dated 17 May 1994 and 21 August 1997 recommended a No Further Action document be prepared for Site 12.*” The August 21, 1997 letter did not provide concurrence with no further action. The referenced letters are quoted below.

- C NDEP’s letter dated May 17, 1994 stated “ *The Division concurs with the recommendation of no further investigative or remedial actions at Site 12 **at this time**. The contaminated groundwater beneath the site will be addressed during remedial actions at Site 14. Upon compliance with community relations requirements, please prepare a ROD for this Site.*”
- C NDEP’s letter dated August 21, 1997 states “ *Pursuant to the NDEP letter of March 5, 1996, closure of the shop plumbing and leach field must be confirmed prior to closure of the site and*

finalization of decision documents.”

NDEP’s concurrence with “No Further Action **at this time**” in the May 17, 1994 letter was provided prior to the draft CGA Report dated December 1997 which presented proposed, revised interpretations for the extent of groundwater plumes at Site 12. The NDEP is now concerned that the nature and extent of contamination associated with Site 12 does not appear to be well understood. Accordingly, the NDEP’s previous concurrence with a “No Further Action” determination is no longer valid. NAS Fallon needs to re-evaluate Site 11. See comment **12** below.

12. Page 8, Section V. Future Activity at Site 12: NAS Fallon has stated that administrative controls will be imposed on Site 12. Administrative controls are subject to future audit.

As stated in comment **11** above, NAS Fallon needs to re-evaluate Site 12. A proposed plan of action which addresses NAS Fallon’s plans for re-evaluating contamination that appears to originate from Site 12 needs to be submitted to the NDEP for review. The plan of action also needs to address NDEP’s concerns presented in this letter.

13. Page 9, Section VI. Recommendations: The Draft Final Decision Document states “*This Decision Document represents the selection of a no action alternative and subsequent closure for Site 12 at NAS Fallon, Fallon, Nevada. The no action alternative was developed in accordance with CERCLA as amended and is consistent with the NCP. This decision is supported by the documents in the administrative record for the site.*”

The NDEP does not concur with the last two sentences in the above quote for the reasons stated in this letter.

14. NAS Fallon needs to address all comments in NDEP’s January 22, 1999 letter for Site 12. Comments which need to be addressed, but have not been completely discussed above include the following:

Item 3 in NDEP’s January 22, 1999 letter

Information or data that are used to support the “No Further Action” recommendation needs to include supporting documentation. Documentation does not need to be provided with the Decision Document, but needs to be present in NDEP’s files. Examples of supporting documentation for Site 12 missing from the NDEP files are listed below.

- C Laboratory analytical reports.
- C Logs for the seven borings, including field screening results for soil samples.
- C Sampling and Analysis Plan for the RI/FS (Volume III of the RI/FS Work Plan).

NAS Fallon needs to either provide the supporting documentation, or state the supporting documentation does not exist and is not included in the Administrative Record.

15. Appendix C, page C-13, first paragraph: The Draft Final Decision Document states “*Closure of Site 12 leach fields and shop plumbing has been accomplished.*” Drawings showing the plumbing associated with the pest control shop, storage building and leachfields need to be provided to the NDEP for review. The NDEP will also need to perform a field inspection to confirm closure of the shop plumbing and leachfield.